

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	Bankruptcy No. 19-20620-GLT
BONNIE KUNKLE,	:	
Debtor(s)	:	
	:	Chapter 13
Trustee, or Debtors(s), Movant	:	
	:	
v.	:	
	:	
Respondents	:	

**DEBTOR'S CERTIFICATION OF DISCHARGE ELIGIBILITY**

1. The Debtor has made all payments required by the Chapter 13 Plan. Debtor's heir ELYSHA BROWN, completed the Plan.
2. Include whichever one of the two following statements applies:  
**The Debtor is not required to pay any Domestic Support Obligations.**
3. The Debtor is entitled to a discharge under the terms of Section 1328 of the Bankruptcy Code. The Debtor has not received a prior discharge in a bankruptcy case within the time frames specified in Section 1328(f)(1) of the Bankruptcy Code. Section 1328(h) of the Bankruptcy Code does not render the Debtor ineligible for a discharge.
4. Debtor has not complied with Federal Rule of Bankruptcy Procedure 1007(c) by filing a *Certification of Completion of Postpetition Instructional Course in Personal Financial Management*, with the *Certificate of Completion* attached to the form. Debtor's heir, ELYSHA BROWN, who is Debtor's granddaughter and only heir has instructed Debtor's counsel to file a motion to excuse this requirement because of Debtor's death. Debtor's counsel has filed the motion and it has not been ruled on by the Court. The debtor is exempt from the requirement as stated in Section 109(h)(4) of the Bankruptcy Code

"The requirements of paragraph (1) shall not apply with respect to a debtor whom the court determines, after notice and hearing, is unable to complete those requirements because of incapacity, disability, or active military duty in a military combat zone. For the purposes of this paragraph, incapacity means that the debtor is impaired by reason of mental illness or mental deficiency so that he is incapable of realizing and making rational decisions with respect to his financial responsibilities; and "disability" means that the debtor is so physically impaired as to be unable, after reasonable effort, to participate in an in person, telephone, or Internet briefing required under paragraph (1)."

This Certification is being signed under penalty of perjury by *(include whichever one of the two following statements applies)* **Undersigned Counsel duly questioned Debtor(s) heir about the statements in this Certification and verified the answers in support of this Certification.**

DATED: 10/11/2023

/s/ Michael S. Geisler

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**MICHAEL S. GEISLER, ESQUIRE**

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**PAWB Local Form 24 (07/13)**